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CLEARINGHOUSE RULE 97-098

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

4. Adequacy of References to Related Statutes, Rules and Forms

a. In s. HFS 139.03 (7), it appears that “250” should replace “252.” In the alternative, “state health officer” could be defined by merely cross-referencing the statutory definition in s. 250.01 (9), Stats.

b. In s. HFS 139.06 (2), on line 3, the general reference to ch. HSS 160 could be changed to refer instead to “those provisions.” Also, the proposed subsection refers to s. HSS 160.05 (1) (a), (b) or (c), but does not refer to par. (d), which allows persons to take the registered sanitarian examination with a high school diploma and eight years of employment in the field of environmental health. Is this omission intended?

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. The word “local” should be inserted at the beginning of the third line of s. HFS 139.04.

b. In s. HFS 139.05 (2), is there a reason why this provision deals only with Level I *county, city-county or multicounty* local health departments rather than with *all* Level I departments, which would include those listed plus city, town and village local health departments?

c. In s. HFS 139.06 (1), the word “Being” could be inserted at the beginning of the sentence for readability. Likewise, in sub. (2), the word “Meeting” could be inserted at the beginning and the phrase “having or being” could replace the phrase “has or is” on line 2.

d. In s. HFS 139.07 (2), the word “nursing” should be inserted after each occurrence of the word “health” on line 3.

e. In s. HFS 139.08, is there a reason why language in sub. (1) refers to “full-time experience in *a general* public health nursing *program*” (emphasis added), while sub. (2) refers to full-time experience “in public health nursing”? If a distinction between the two is not intended, the language should read the same way in both provisions to avoid confusion.